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October 24A, 2003

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Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: WC Docket No. 03-194 – Application by Qwest Communications International Inc. for Authority to Provide In-Region InterLATA Services in the State of Arizona

REDACTED FOR PUBLIC INSPECTION

Dear Ms. Dortch:

Qwest Communications International Inc. ("Qwest") submits this filing at the request of Commission staff to provide supporting documentation in connection with Qwest's earlier statements regarding the human coding errors and reporting issues that caused Qwest to miss the parity standard under Performance Indicator Definition ("PID") OP-3 for certain conditioned loops from May through August, 2003.¹ Attachment A to this filing identifies those CLEC orders received by Qwest during this period and indicates which of those orders met or missed the OP-3 provisioning interval before and after the previously-described errors were corrected and the data was re-run. To the extent Qwest did not meet the provisioning interval for a particular order after the data was re-run, Attachment A also describes the remedial measures Qwest took to prevent such a miss from recurring.

At the request of Commission staff, Qwest also provides below its performance results for conditioned loops under PIDs OP-3D and OP-3E (on a combined basis) from April through August 2003, including a five month average. Qwest previously provided this same information for May through August, 2003.² As indicated in the chart below, Qwest provisioned 82 of 91

¹ See Reply Comments of Qwest Communications International Inc., WC Docket No. 03-194, October 17, 2003, at Attachment A, 5-7.

² See *id.* at 7. As explained in Qwest's reply comments, Qwest implemented a process change in April 2003 so that the line sharing and Qwest DSL Resale and Retail processes allow for line moves when the underlying facility is not DSL-qualified and allow for the removal of Universal Digital Channel. This process change resulted in an expansion in the number of lines that can accommodate line sharing and DSL, and reduced the amount of time required to provision these services. See *id.* at 6. It also provided – and continues to provide – Qwest's regulatory reporting group with additional information, thus enabling that group to identify which orders are more

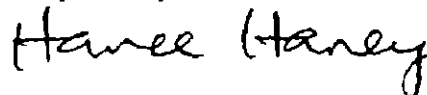
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orders for conditioned loops on a timely basis from April through August. Thus, Qwest's aggregate performance during this five month period exceeded the 90% benchmark for conditioned loops under PIDs OP-3D and OP-3E.

Month	Result	Orders Met
April	82.76%	24 of 29
May	93.3%	14 of 15
June	100%	16 of 16
July	90.5%	19 of 21
August	90%	9 of 10
Apr-Aug Average	90.12%	82 of 91

The 20-page limit does not apply to this filing. Please contact the undersigned if you have any questions concerning this submission.

Respectfully submitted,



Hance Haney

Attachment

cc Cathy Carpino
Bill Dever
Ryan Harsch
Janice Myles
Gary Remondino
Christi Shewman

appropriately counted in the line sharing or DSL category rather than as line conditioning under OP-3. Because this process change was implemented in mid-April, additional information was not generated for that entire month and thus cannot be used to provide re-run results for April. This explains why Attachment A to this filing does not include data for April.

OP3 AZ Unbundled Loop Conditioned Data: May 03-Aug 03

	Order missed in the OP-3 Unbundled Loop Conditioned Metric
	Order was previously a miss based on the system limitation that was corrected and rerun starting mid April 03
	Order met commitment

May 2003 OP-3 Unbundled Conditioned Loop

One of 15 orders missed. Of the 15 orders reported, four were previously counted as a miss before the data was re-run.

Order	TN	Applicable Due Date	Completion Date	Note
		1-May-03	1-May-03	Order's Commitment was met
		8-May-03	8-May-03	These orders met the commitment once data was re-run
		28-May-03	28-May-03	These orders met the commitment once data was re-run
		6-May-03	6-May-03	These orders met the commitment once data was re-run
		20-May-03	20-May-03	These orders met the commitment once data was re-run
		1-May-03	1-May-03	Order's Commitment was met
		15-May-03	15-May-03	Order's Commitment was met
		1-May-03	1-May-03	Order's Commitment was met
		15-May-03	15-May-03	Order's Commitment was met
		21-May-03	21-May-03	Order's Commitment was met
		22-May-03	22-May-03	Order's Commitment was met
		20-May-03	20-May-03	Order's Commitment was met
		22-May-03	22-May-03	Order's Commitment was met
		1-May-03	1-May-03	Order's Commitment was met
		5-May-03	30-Apr-03	Order's Commitment was met

OP3 AZ Unbundled Loop Conditioned Data: May 03-Aug 03

June 2003 OP-3 Unbundled Conditioned Loop

No orders missed. Of the 16 orders reported, two were previously counted as a miss before the data was re-run.

Order	TN	Applicable Due Date	Completion Date	Note
		25-Jun-03	25-Jun-03	These orders met the commitment once data was re-run.
		17-Jun-03	17-Jun-03	These orders met the commitment once data was re-run.
		6-Jun-03	6-Jun-03	Order's Commitment was met
		9-Jun-03	9-Jun-03	Order's Commitment was met
		6-Jun-03	6-Jun-03	Order's Commitment was met
		26-Jun-03	26-Jun-03	Order's Commitment was met
		19-Jun-03	19-Jun-03	Order's Commitment was met
		25-Jun-03	25-Jun-03	Order's Commitment was met
		10-Jun-03	10-Jun-03	Order's Commitment was met
		2-Jun-03	2-Jun-03	Order's Commitment was met
		17-Jun-03	17-Jun-03	Order's Commitment was met
		16-Jun-03	16-Jun-03	Order's Commitment was met
		24-Jun-03	24-Jun-03	Order's Commitment was met
		9-Jun-03	9-Jun-03	Order's Commitment was met
		27-Jun-03	27-Jun-03	Order's Commitment was met
		6-Jun-03	4-Jun-03	Order's Commitment was met

OP3 AZ Unbundled Loop Conditioned Data: May 03-Aug 03

July 2003 OP-3 Unbundled Conditioned Loop

Two of 21 orders missed. Of the 21 orders reported, four were previously counted as a miss before the data was re-run.

Order	TN	Applicable Due Date	Completion Date	Note
		1-Jul-03	1-Jul-03	Order's Commitment was met
		2-Jul-03	15-Jul-03	Order's Commitment was met
		23-Jul-03	23-Jul-03	These orders met the commitment once data was re-run.
		15-Jul-03	15-Jul-03	These orders met the commitment once data was re-run.
		14-Jul-03	14-Jul-03	These orders met the commitment once data was re-run.
		18-Jul-03	18-Jul-03	These orders met the commitment once data was re-run.
		14-Jul-03	14-Jul-03	Order's Commitment was met
		25-Jul-03	25-Jul-03	Order's Commitment was met
		24-Jul-03	24-Jul-03	Order's Commitment was met
		28-Jul-03	28-Jul-03	Order's Commitment was met
		22-Jul-03	22-Jul-03	Order's Commitment was met
		14-Jul-03	14-Jul-03	Order's Commitment was met
		30-Jul-03	30-Jul-03	Order's Commitment was met
		25-Jul-03	25-Jul-03	Order's Commitment was met
		28-Jul-03	28-Jul-03	Order's Commitment was met
		28-Jul-03	17-Jul-03	Order's Commitment was met
		28-Jul-03	21-Jul-03	Order's Commitment was met
		1-Jul-03	1-Jul-03	Order's Commitment was met
		14-Jul-03	14-Jul-03	Order's Commitment was met
		31-Jul-03	31-Jul-03	Order's Commitment was met
		24-Jul-03	23-Jul-03	Order's Commitment was met

OP3 AZ Unbundled Loop Conditioned Data: May 03-Aug 03

Aug 2003 OP-3 Unbundled Conditioned Loop

One of 10 orders missed. Of the 10 orders reported, three were previously counted as a miss before the data was re-run.

Order	TN	Applicable Due Date	Completion Date	Note
		12-Aug-03	12-Aug-03	These orders met the commitment once data was re-run.
		6-Aug-03	6-Aug-03	These orders met the commitment once data was re-run.
		21-Aug-03	21-Aug-03	These orders met the commitment once data was re-run.
		28-Aug-03	28-Aug-03	Order's Commitment was met
		19-Aug-03	19-Aug-03	Order's Commitment was met
		20-Aug-03	20-Aug-03	Order's Commitment was met
		4-Aug-03	4-Aug-03	Order's Commitment was met
		26-Aug-03	26-Aug-03	Order's Commitment was met
		8-Sep-03	22-Aug-03	Order's Commitment was met